

**UNITED STATE BANKRUPTCY COURT
Eastern District of Pennsylvania**

In re: : **Chapter 13**
JOE RIVERA : **NO. 19-14239**
Debtor :

ANSWER TO TRUSTEE'S MOTION FOR DISMISSAL

To the Honorable Judges of the United States Bankruptcy Court for the Eastern District of Pennsylvania

1. Your respondent is debtor Joe Rivera.
2. Admitted.
3. a. There has been no unreasonable delay and the requested documents have been submitted.
b. The Second Amended Plan that has been filed is feasible.

WHEREFORE, respondent requests that the Motion of Dismissal of the Trustee be denied.

Respectfully submitted,

/S/ Kenneth L. Mirsky
KENNETH L. MIRSKY, ESQUIRE
Attorney for Debtor
2033 Walnut Street
Philadelphia, PA 19103
(215) 569-4055

**UNITED STATE BANKRUPTCY COURT
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ORDER

AND NOW, this day of , 2019, it is ORDERED
that the Chapter 13 Standing Trustee's Motion for Dismissal is DENIED.

BY THE COURT:

J.

cc: Scott F. Waterman, Esquire
Chapter 13 Standing Trustee
2901 St. Lawrence Avenue, Suite 100
Reading, PA 19606

Kenneth L. Mirsky, Esquire
2033 Walnut Street
Philadelphia, PA 19103

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE

JOE RIVERA

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NO. 19-14239

Chapter 13

CERTIFICATION OF SERVICE

I, KENNETH L. MIRSKY, ESQUIRE, attorney for debtor JOE RIVERA, certify that debtor's Answer to Trustee's Motion for Dismissal was electronically filed with the Clerk of the United States Bankruptcy Court for the Eastern District of Pennsylvania and is available for viewing and downloading from the ECF System by the following:

Scott F. Waterman, Esquire
Chapter 13 Standing Trustee
2901 St. Lawrence Avenue, Suite 100
Reading, PA 19606

/S/ Kenneth L. Mirsky
KENNETH L. MIRSKY, ESQUIRE
Attorney for Debtor